

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

ZURU (SINGAPORE) PTE., LTD;  
ZURU INC.,  
  
Plaintiffs,  
  
v.  
  
THE INDIVIDUALS, CORPORATIONS,  
LIMITED LIABILITY COMPANIES,  
PARTNERSHIPS, AND  
UNINCORPORATED ASSOCIATIONS  
IDENTIFIED ON SCHEDULE A TO THE  
COMPLAINT,  
  
Defendants.

~~[PROPOSED]~~ PRELIMINARY INJUNCTION ORDER

**THIS MATTER** comes before the Court on Plaintiffs Zuru (Singapore) PTE., LTD and Zuru Inc. (collectively, “Plaintiffs”), brought by way of Order to Show Cause, for entry of a Preliminary Injunction (the “Application”) against the Defendants identified on Schedule A to the ~~[Proposed]~~ Preliminary Injunction Order attached hereto (collectively, the “PI Defendants”) and using at least the domain names identified in the Amended Schedule A (the “PI Defendant Domain Names”) and the online marketplace accounts identified in the Amended Schedule A (the “Online Marketplace Accounts”); and

**THE COURT** having reviewed the papers in support of and in opposition to the Application; and the Court having found that Plaintiffs meet the criteria for entry of preliminary injunctive relief; and

This Court further finds that it has personal jurisdiction over the PI Defendants because the PI Defendants directly target their business activities toward consumers in the United States.

including New York, offering to sell and ship products into this Judicial District. Specifically, PI Defendants are reaching out to do business with New York residents by operating one or more commercial, interactive Internet Stores through which New York residents can purchase products bearing counterfeit versions of the ROBO FISH products incorporating Plaintiffs' ROBO FISH trademark, which is covered by U.S. Trademark Registration No. 4440702, and ROBO ALIVE trademark, which is covered by U.S. Trademark Registration No. 5294215 (together, the "ROBO FISH Trademarks"), and/or Plaintiffs' copyrights, which are covered by U.S. Copyright Office Registration Nos. VA 2-248-953, VA 2-249-214, VA 2-253-391, VA 2-253-392, VA 2-253-394, and VA 2-253-396 (the "ROBO FISH Copyrights" or "ROBO FISH Copyright Registrations")

**THIS COURT** having determined that the evidence submitted in support of the Application establishes Plaintiffs have a likelihood of success on the merits; that no remedy at law exists; and that Plaintiffs will suffer irreparable harm if the injunction is not granted including for example

1. Through the Declarations of Michael Yellin and Stephen Drysdale and accompanying evidence, Plaintiffs has proved a prima facie case of trademark infringement because (1) the ROBO FISH Trademarks are distinctive marks and registered with the U.S. Patent and Trademark Office on the Principal Register, (2) PI Defendants are not licensed or authorized to use the ROBO FISH Trademarks, and (3) PI Defendants' use of the ROBO FISH Trademarks is causing a likelihood of confusion as to the origin or sponsorship of PI Defendants' products with Plaintiffs; and
2. Plaintiffs has also proved a prima facie case of copyright infringement because PI Defendants have copied Plaintiffs' copyrights for the ROBO FISH products without Plaintiffs' consent; and

3. PI Defendants' continued and unauthorized use of the ROBO FISH Trademarks and ROBO FISH Copyrights irreparably harms Plaintiffs through diminished goodwill and brand confidence, damage to Plaintiffs' reputation, loss of exclusivity, and loss of future sales.
4. Monetary damages fail to address such damage and, therefore, Plaintiffs have an inadequate remedy at law; and
5. The public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by PI Defendants' actions; and

**THIS COURT** having determined, therefore, that injunctive relief initially granted in the Temporary Restraining Order ("**TRO**") on April 4, 2022 [Dkt. No. 21] and later extended on April 18, April 22, and April 29, 2022 [Dkt. Nos. 28, 33, 40] should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under the Federal Rule of Civil Procedure 65;

**NOW THEREFORE**, on this 17th day of May, 2022, this Court **ORDERS** that:

1. PI Defendants, their affiliates, officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be temporarily enjoined and restrained from:

a. Using Plaintiffs' ROBO FISH Trademarks, ROBO FISH Copyrights, or any reproductions, counterfeit copies, or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine ROBO FISH product or not authorized by Plaintiffs to be sold in connection with Plaintiffs' ROBO FISH Trademarks and/or Copyrights;

b. Passing off, inducing, or enabling others to sell or pass off any product as a genuine ROBO FISH product or any other product produced by Plaintiffs, that is not Plaintiffs' or not produced under the authorization, control, or supervision of Plaintiffs and approved by Plaintiffs for sale under the Plaintiffs ROBO FISH Trademarks and/or Copyrights;

c. Committing any acts calculated to cause consumers to believe that PI Defendants' products are those sold under the authorization, control or supervision of Plaintiffs, or are sponsored by, approved by, or otherwise connected with Plaintiffs;

d. Further infringing the Plaintiffs' ROBO FISH Trademarks and/or Copyrights and damaging Plaintiffs' goodwill;

e. Otherwise competing unfairly with Plaintiffs in any manner;

f. Shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Plaintiffs, nor authorized by Plaintiffs to be sold or offered for sale, and which bear any of Plaintiffs' ROBO FISH Trademarks and/or Copyrights or any reproductions, counterfeit copies, or colorable imitations thereof;

g. Using, linking to, transferring, selling, exercising control over, or otherwise owning the Online Marketplace Accounts, the Defendant Domain Names, or any other domain name or online marketplace account that is being used to sell or is the means by which PI Defendants could continue to sell counterfeit ROBO FISH products; and

h. Operating and/or hosting websites at the Defendant Domain Names and any other domain names registered or operated by PI Defendants that are involved with the distribution, marketing, advertising, offering for sale, or sale of any product bearing the Plaintiffs' ROBO FISH Trademarks and/or Copyrights or any reproductions, counterfeit copies, or colorable imitations

thereof that is not a genuine ROBO FISH product or not authorized by Plaintiffs to be sold in connection with the Plaintiffs' ROBO FISH Trademarks and/or Copyrights.

2. Each Defendant, within fourteen (14) days after receiving notice of this Order, shall serve upon Plaintiffs a written report under oath providing: (a) their true name and physical address, (b) all websites and online marketplace accounts on any platform that they own and/or operate (c) their financial accounts, including by way of example, all bank AliPay, AllPay/GoAllPay, Amazon, Bank of China, Coinbase, DHgate, eBay, HyperWallet, JD.com, Joom, Lakala, LianLian, OFX, Paxful, PayEco, Payoneer, PayPal, PingPong, SellersFunding, Shopify, Stripe, Union Mobile/UmPay/UmPay2, Walmart, Wise/TransferWise, Wish, and World First accounts, and (d) the steps taken by each Defendant to comply with paragraph 1, a through h, above.

3. The domain name registries for the Defendant Domain Names, including, but not Limited to, VeriSign, Inc., Neustar, Inc., Afiliast Limited, CentralNic, Nominet, and the Public Interest Registry, within three (3) business days of receipt of this Order or prior to expiration of this Order, whichever date shall occur first, shall disable the Defendant Domain Names and make them inactive and untransferable until further ordered by this Court.

4. Those in privity with PI Defendants and with actual notice of this Order, including any online marketplaces such as Amazon, Wish, DHGate, AliExpress, and eBay, social media platforms, Facebook, YouTube, LinkedIn, Twitter, Internet search engines such as Google, Bing, and Yahoo, web hosts for the Defendant Domain Names, and domain name registrars, shall within three (3) business days of receipt of this Order:

a. disable and cease providing services for any accounts through which PI Defendants engage in the sale of counterfeit and infringing goods using the ROBO FISH Trademarks and/or Copyrights, including any accounts associated with the PI Defendants;

b. disable and cease displaying any advertisements used by or associated with PI Defendants in connection with the sale of counterfeit and infringing goods using the ROBO FISH Trademark and/or copyrights; and

c. take all steps necessary to prevent links to the Defendant Domain Names identified on the Amended Schedule A from displaying in search results, including, but not limited to, removing links to the PI Defendant Domain Names from any search index.

5. PI Defendants and any third party with actual notice of this Order who is providing services for any of the PI Defendants, or in connection with any of PI Defendants' websites at the PI Defendant Domain Names or other websites operated by PI Defendants, including, without limitation, any online marketplace platforms such as Amazon, Wish, DHGate, AliExpress, and eBay, Facebook, Internet Service Providers ("ISP"), web hosts, back-end service providers, web designers, sponsored search engine or ad-word providers, banks, merchant account providers, including AliPay, AllPay/GoAllPay, Amazon, Bank of China, Coinbase, DHgate, eBay, HyperWallet, JD.com, Joom, Lakala, LianLian, OFX, Paxful, PayEco, Payoneer, PayPal, PingPong, SellersFunding, Shopify, Stripe, Union Mobile/UmPay/UmPay2, Walmart, Wise/TransferWise, Wish, and World First, third party processors and other payment processing service providers, shippers, and domain name registrars (collectively, the "Third Party Providers") shall, within five (5) business days after receipt of such notice, provide to Plaintiffs expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

a. The identities and locations of PI Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information;

b. The nature of PI Defendants' operations and all associated sales and financial information, including, without limitation, identifying information associated with the Online Marketplace Accounts, the Defendant Domain Names, and PI Defendants' financial accounts, as well as providing a full accounting of PI Defendants' sales and listing history related to their respective Online Marketplace Accounts and PI Defendant Domain Names;

c. PI Defendants' websites and/or any Online Marketplace Accounts;

d. The PI Defendant Domain Names or any domain name registered by PI Defendants; and

e. Any financial accounts owned or controlled by PI Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including, without limitation, AliPay, AllPay/GoAllPay, Amazon, Bank of China, Coinbase, DHgate, eBay, HyperWallet, JD.com, Joom, Lakala, LianLian, OFX, Paxful, PayEco, Payoneer, PayPal, PingPong, SellersFunding, Shopify, Stripe, Union Mobile/UmPay/UmPay2, Walmart, Wise/TransferWise, Wish, World First, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).

6. PI Defendants and any persons in active concert or participation with them who have actual notice of this Order shall be temporarily restrained and enjoined from transferring or disposing of any money or other of PI Defendants' assets until further ordered by this Court.

7. Western Union shall, within five (5) business days of receipt of this Order, block any Western Union money transfers and funds from being received by the PI Defendants identified in Schedule A to the [Proposed] Preliminary Injunction Order until further ordered by this Court.

8. Amazon, Wish, DHGate, AliExpress, and eBay shall, within five (5) business days of receipt of this Order, for any Defendant or any of PI Defendants' Online Marketplace Accounts or websites:

a. Locate all accounts and funds connected to and related to PI Defendants, Defendants' Online Marketplace Accounts or PI Defendants' websites, including, but not limited to, any AliPay, AllPay/GoAllPay, Amazon, Bank of China, Coinbase, DHgate, eBay, HyperWallet, JD.com, Joom, Lakala, LianLian, OFX, Paxful, PayEco, Payoneer, PayPal, PingPong, SellersFunding, Shopify, Stripe, Union Mobile/UmPay/UmPay2, Walmart, Wise/TransferWise, Wish, and World First accounts connected to and related to the information listed in Amended Schedule A to the Complaint; and

b. Restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of PI Defendants' assets until further ordered by this Court.

9. Any banks, savings and loan associations, payment processors, or other financial institutions, for any Defendant or any of PI Defendants' Online Marketplace Accounts or websites, shall within five (5) business days of receipt of this Order:

a. Locate all accounts and funds connected to PI Defendants, PI Defendants' Online Marketplace Accounts or PI Defendants' websites, including, but not limited to, any accounts connected to the information listed in the Amended Schedule A to the Complaint; and

b. Restrain and enjoin such accounts from receiving, transferring or disposing of any money or other of PI Defendants' assets until further ordered by this Court.



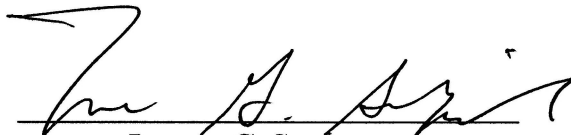
10. Plaintiffs may provide notice of these proceedings to PI Defendants by electronically publishing a link to the Complaint, this Order and other relevant documents on a website ~~or~~ <sup>and</sup> by sending an e-mail to all e-mail addresses identified by Plaintiffs and any e-mail addresses provided for PI Defendants by third parties that includes a link to said website. The combination of providing notice via electronic publication or e-mail, along with any notice that PI Defendants receive from domain name registrars and payment processors, shall constitute notice reasonably calculated under all circumstances to apprise PI Defendants of the pendency of the action and afford them the opportunity to present their objections.

11. Plaintiffs' Amended Schedule A to the Complaint, Exhibit 2 to the Declaration of Stephen Drysdale and the TRO shall become unsealed.

12. Any PI Defendants that are subject to this Order may appear and move to dissolve or modify the Order on two days' notice to Plaintiffs or on shorter notice as set by this Court.

13. The five thousand dollars (\$5,000.00) bond posted by Plaintiffs shall remain with the Court until a final disposition of this case or until this Preliminary Injunction is terminated.

Dated: May 17, 2022

  
**LORNA G. SCHOFIELD**  
**UNITED STATES DISTRICT JUDGE**

**SCHEDULE A TO ~~PROPOSED~~ PRELIMINARY INJUNCTION ORDER**

<b>No.</b>	<b>PI Defendants</b>	<b>PI Defendant Domain Names or Online Marketplace Accounts</b>
1.	A home-loving you Store	<a href="https://www.aliexpress.com/store/912028050">https://www.aliexpress.com/store/912028050</a>
2.	All for the children Store	<a href="https://www.aliexpress.com/store/912689931">https://www.aliexpress.com/store/912689931</a>
3.	ALL-IN-ONE- Store	<a href="https://www.aliexpress.com/store/539708">https://www.aliexpress.com/store/539708</a>
4.	AYDAYAN Store	<a href="https://www.aliexpress.com/store/912576182">https://www.aliexpress.com/store/912576182</a>
5.	Beavertoy Store	<a href="https://www.aliexpress.com/store/912616149">https://www.aliexpress.com/store/912616149</a>
6.	Bert-01 Store	<a href="https://www.aliexpress.com/store/4524025">https://www.aliexpress.com/store/4524025</a>
7.	Bluskyer Store	<a href="https://www.aliexpress.com/store/4496025">https://www.aliexpress.com/store/4496025</a>
8.	BOUSSAC PetShop Store	<a href="https://www.aliexpress.com/store/911799229">https://www.aliexpress.com/store/911799229</a>
9.	Charlie Luna Store	<a href="https://www.aliexpress.com/store/912584414">https://www.aliexpress.com/store/912584414</a>
10.	Children 777 Store	<a href="https://www.aliexpress.com/store/912680914">https://www.aliexpress.com/store/912680914</a>
11.	cn1059961580qxxae Store	<a href="https://www.aliexpress.com/store/912720131">https://www.aliexpress.com/store/912720131</a>
12.	cn1059961626hasae Store	<a href="https://www.aliexpress.com/store/912718162">https://www.aliexpress.com/store/912718162</a>
13.	cn86852ltxx Store	<a href="https://www.aliexpress.com/store/912725103">https://www.aliexpress.com/store/912725103</a>
14.	Cosima and Kira Store	<a href="https://www.aliexpress.com/store/911791141">https://www.aliexpress.com/store/911791141</a>
15.	Daily PuppyLuv Supplies Store	<a href="https://www.aliexpress.com/store/912419260">https://www.aliexpress.com/store/912419260</a>
16.	Ding Ding Pet Store	<a href="https://www.aliexpress.com/store/1100133073">https://www.aliexpress.com/store/1100133073</a>
17.	Dingding Pets Life Store	<a href="https://www.aliexpress.com/store/912247002">https://www.aliexpress.com/store/912247002</a>
18.	Dream-heaven Store	<a href="https://www.aliexpress.com/store/912304290">https://www.aliexpress.com/store/912304290</a>
19.	Eastong Store	<a href="https://www.aliexpress.com/store/912125114">https://www.aliexpress.com/store/912125114</a>
20.	Elewelt Store	<a href="https://www.aliexpress.com/store/912619141">https://www.aliexpress.com/store/912619141</a>
21.	Factory RGB LED Light Store	<a href="https://www.aliexpress.com/store/911079030">https://www.aliexpress.com/store/911079030</a>
22.	faina's Store	<a href="https://www.aliexpress.com/store/5484036">https://www.aliexpress.com/store/5484036</a>
23.	FashionPet Store	<a href="https://www.aliexpress.com/store/911871294">https://www.aliexpress.com/store/911871294</a>
24.	General merchandise store Store	<a href="https://www.aliexpress.com/store/912663914">https://www.aliexpress.com/store/912663914</a>
25.	ggxxttxs Store	<a href="https://www.aliexpress.com/store/911195190">https://www.aliexpress.com/store/911195190</a>
26.	Good Life Homes Store	<a href="https://www.aliexpress.com/store/912750146">https://www.aliexpress.com/store/912750146</a>
27.	HappyCWCW Store	<a href="https://www.aliexpress.com/store/5637122">https://www.aliexpress.com/store/5637122</a>
28.	Hiri Store	<a href="https://www.aliexpress.com/store/5383082">https://www.aliexpress.com/store/5383082</a>
29.	HOSPORT Lighting Store	<a href="https://www.aliexpress.com/store/3393015">https://www.aliexpress.com/store/3393015</a>
30.	JSXuan Official Store	<a href="https://www.aliexpress.com/store/3257118">https://www.aliexpress.com/store/3257118</a>
31.	KEMISIDI Official Store	<a href="https://www.aliexpress.com/store/2803228">https://www.aliexpress.com/store/2803228</a>
32.	K-K Building Block Store	<a href="https://www.aliexpress.com/store/4478101">https://www.aliexpress.com/store/4478101</a>
33.	kom HomeSupplies Store	<a href="https://www.aliexpress.com/store/912402842">https://www.aliexpress.com/store/912402842</a>
34.	KOSIMIA GAMIA Store	<a href="https://www.aliexpress.com/store/912272918">https://www.aliexpress.com/store/912272918</a>
35.	Laugh laugh toy store	<a href="https://www.aliexpress.com/store/3014001?spm=a2g0o.detail.1000007.1.65737337RNQqZU">https://www.aliexpress.com/store/3014001?spm=a2g0o.detail.1000007.1.65737337RNQqZU</a>

No.	PI Defendants	PI Defendant Domain Names or Online Marketplace Accounts
36.	lclanyifeng Store	<a href="https://www.aliexpress.com/store/912719151">https://www.aliexpress.com/store/912719151</a>
37.	lxfumengqing Store	<a href="https://www.aliexpress.com/store/912726114">https://www.aliexpress.com/store/912726114</a>
38.	lxmlailizhu Store	<a href="https://www.aliexpress.com/store/912724091">https://www.aliexpress.com/store/912724091</a>
39.	lxtongyoushuang Store	<a href="https://www.aliexpress.com/store/912719148">https://www.aliexpress.com/store/912719148</a>
40.	LIUXDIV Pets Store	<a href="https://www.aliexpress.com/store/912157338">https://www.aliexpress.com/store/912157338</a>
41.	Luck2022 Store	<a href="https://www.aliexpress.com/store/912632015">https://www.aliexpress.com/store/912632015</a>
42.	lvse life Store	<a href="https://www.aliexpress.com/store/3616160">https://www.aliexpress.com/store/3616160</a>
43.	Mbaby Store	<a href="https://www.aliexpress.com/store/1100090053">https://www.aliexpress.com/store/1100090053</a>
44.	Meow Meow Bark Bark Store	<a href="https://www.aliexpress.com/store/912690632">https://www.aliexpress.com/store/912690632</a>
45.	My good friend toy Store	<a href="https://www.aliexpress.com/store/3476023">https://www.aliexpress.com/store/3476023</a>
46.	Nan Rui Store	<a href="https://www.aliexpress.com/store/5087046">https://www.aliexpress.com/store/5087046</a>
47.	Pets Warm Homes Store Store	<a href="https://www.aliexpress.com/store/1100087103">https://www.aliexpress.com/store/1100087103</a>
48.	PTHAFUN PetHappyFun Store	<a href="https://www.aliexpress.com/store/911133231">https://www.aliexpress.com/store/911133231</a>
49.	QQ Pets Online Store	<a href="https://www.aliexpress.com/store/912312215">https://www.aliexpress.com/store/912312215</a>
50.	Riro Ding Dang Store	<a href="https://www.aliexpress.com/store/910452094">https://www.aliexpress.com/store/910452094</a>
51.	RSea Store	<a href="https://www.aliexpress.com/store/910319029">https://www.aliexpress.com/store/910319029</a>
52.	sfhOme Store	<a href="https://www.aliexpress.com/store/912660342">https://www.aliexpress.com/store/912660342</a>
53.	Shop1100007062 Store	<a href="https://www.aliexpress.com/store/1100007062">https://www.aliexpress.com/store/1100007062</a>
54.	Shop1100032055 Store	<a href="https://www.aliexpress.com/store/1100032055">https://www.aliexpress.com/store/1100032055</a>
55.	Shop4046058 Store	<a href="https://www.aliexpress.com/store/4046058">https://www.aliexpress.com/store/4046058</a>
56.	Shop5431295 Store	<a href="https://www.aliexpress.com/store/5431295">https://www.aliexpress.com/store/5431295</a>
57.	Shop911068087 Store	<a href="https://www.aliexpress.com/store/911068087">https://www.aliexpress.com/store/911068087</a>
58.	Shop912624065 Store	<a href="https://www.aliexpress.com/store/912624065">https://www.aliexpress.com/store/912624065</a>
60.	SPAKOGY Store	<a href="https://www.aliexpress.com/store/912679650">https://www.aliexpress.com/store/912679650</a>
61.	tchomeandstationary Store	<a href="https://www.aliexpress.com/store/605769">https://www.aliexpress.com/store/605769</a>
62.	THE SPRING BLOSSOMS Store	<a href="https://www.aliexpress.com/store/5602351">https://www.aliexpress.com/store/5602351</a>
63.	Toy Encyclopedia Store	<a href="https://www.aliexpress.com/store/912074094">https://www.aliexpress.com/store/912074094</a>
64.	University Store	<a href="https://www.aliexpress.com/store/1189807">https://www.aliexpress.com/store/1189807</a>
65.	Unswervingly Store	<a href="https://www.aliexpress.com/store/912059197">https://www.aliexpress.com/store/912059197</a>
66.	Warm Animal Supplies Retail Store	<a href="https://www.aliexpress.com/store/4504019">https://www.aliexpress.com/store/4504019</a>
67.	XIAO-Glittering Store	<a href="https://www.aliexpress.com/store/2088031">https://www.aliexpress.com/store/2088031</a>
68.	XiuYaoGai Store	<a href="https://www.aliexpress.com/store/911130113">https://www.aliexpress.com/store/911130113</a>
69.	Yan0214 Store	<a href="https://www.aliexpress.com/store/912392088">https://www.aliexpress.com/store/912392088</a>
70.	YeeYoo Store	<a href="https://www.aliexpress.com/store/912661751">https://www.aliexpress.com/store/912661751</a>
71.	Yg Trece Daily Need Store	<a href="https://www.aliexpress.com/store/912654806">https://www.aliexpress.com/store/912654806</a>
72.	Your House Light Store	<a href="https://www.aliexpress.com/store/912222047">https://www.aliexpress.com/store/912222047</a>
73.	Your Kitchen Supplies Good Store	<a href="https://www.aliexpress.com/store/912365289">https://www.aliexpress.com/store/912365289</a>

No.	PI Defendants	PI Defendant Domain Names or Online Marketplace Accounts
74.	Your Little House Store	<a href="https://www.aliexpress.com/store/911327179">https://www.aliexpress.com/store/911327179</a>
76.	CAOYUEY	<a href="https://www.amazon.com/sp?seller=A3TI88FODTHOGN">https://www.amazon.com/sp?seller=A3TI88FODTHOGN</a>
77.	Coollun	<a href="https://www.amazon.com/sp?seller=A2JJDJF8HSUGK3">https://www.amazon.com/sp?seller=A2JJDJF8HSUGK3</a>
78.	CuiZhuShangMao	<a href="https://www.amazon.com/sp?seller=A3IG881TGL146L">https://www.amazon.com/sp?seller=A3IG881TGL146L</a>
79.	Dasanito3089	<a href="https://www.amazon.ca/sp?seller=A25LCJW7DOL5BR">https://www.amazon.ca/sp?seller=A25LCJW7DOL5BR</a>
80.	eMart Tech	<a href="https://www.amazon.com/sp?seller=a2qqot98n098in">https://www.amazon.com/sp?seller=a2qqot98n098in</a>
81.	FeetBu	<a href="https://www.amazon.fr/sp?seller=AIRFEQU3BWUVL">https://www.amazon.fr/sp?seller=AIRFEQU3BWUVL</a>
82.	Fuccus	<a href="https://www.amazon.com/sp?seller=A2IIF8I94O0QQP">https://www.amazon.com/sp?seller=A2IIF8I94O0QQP</a>
83.	Gnudo1511	<a href="https://www.amazon.ca/sp?seller=A33GPXHSK4E3OL">https://www.amazon.ca/sp?seller=A33GPXHSK4E3OL</a>
85.	HeNanGuRuanShangMaoYouXianGongSi	<a href="https://www.amazon.com/sp?seller=A25PDDCB57NHCH">https://www.amazon.com/sp?seller=A25PDDCB57NHCH</a>
86.	Hobby-Japan	<a href="https://www.amazon.com/sp?seller=A29OGUEZDN3VDN">https://www.amazon.com/sp?seller=A29OGUEZDN3VDN</a>
87.	HTHAU	<a href="https://www.amazon.com/sp?seller=A35Y6QOILD84L8">https://www.amazon.com/sp?seller=A35Y6QOILD84L8</a>
88.	HUIWI	<a href="https://www.amazon.com/sp?seller=A11MZA18IAEJ9O">https://www.amazon.com/sp?seller=A11MZA18IAEJ9O</a>
89.	Huo Fei Shop	<a href="https://www.amazon.com/sp?seller=A2LW1TB6NYBBHQ">https://www.amazon.com/sp?seller=A2LW1TB6NYBBHQ</a>
90.	jkshop888	<a href="https://www.amazon.com/sp?seller=A30FV30W6NJH5Q">https://www.amazon.com/sp?seller=A30FV30W6NJH5Q</a>
91.	JUILE YUAN	<a href="https://www.amazon.com/sp?seller=A2M1R9PJ5REZZW">https://www.amazon.com/sp?seller=A2M1R9PJ5REZZW</a>
92.	king selling	<a href="https://www.amazon.ca/sp?seller=A3WYRF06MZCHV">https://www.amazon.ca/sp?seller=A3WYRF06MZCHV</a>
93.	Landsee	<a href="https://www.amazon.com/sp?seller=AH6QQUJMA TS5T">https://www.amazon.com/sp?seller=AH6QQUJMA TS5T</a>
94.	LinDiDa	<a href="https://www.amazon.com/sp?seller=A2ZKO4UCNR07QY">https://www.amazon.com/sp?seller=A2ZKO4UCNR07QY</a>
95.	LOVELY KID'S HOUSE	<a href="https://www.amazon.com/sp?seller=A2P551AY126GWK">https://www.amazon.com/sp?seller=A2P551AY126GWK</a>
96.	Luck Dawn	<a href="https://www.amazon.com/sp?seller=A2E89FYY30V69T">https://www.amazon.com/sp?seller=A2E89FYY30V69T</a>

No.	PI Defendants	PI Defendant Domain Names or Online Marketplace Accounts
97.	Mai Ruimei	<a href="https://www.amazon.com/sp?seller=A3RTJW5EOGU0VS">https://www.amazon.com/sp?seller=A3RTJW5EOGU0VS</a>
98.	Mannew	<a href="https://www.amazon.com/sp?seller=A1RKX5VK3854M">https://www.amazon.com/sp?seller=A1RKX5VK3854M</a>
99.	micasot-US	<a href="https://www.amazon.com/sp?seller=A2G3NPDO16Q3S5">https://www.amazon.com/sp?seller=A2G3NPDO16Q3S5</a>
100.	MOONSHUTTLE USA	<a href="https://www.amazon.com/sp?seller=a1xjj3jiymaf2s">https://www.amazon.com/sp?seller=a1xjj3jiymaf2s</a>
101.	Oceans Moon Dream	<a href="https://www.amazon.ca/sp?marketplaceID=A2EUQ1WTGCTBG2&amp;seller=A1B17WSZGN1XUQ&amp;ref=dp_merchant_link">https://www.amazon.ca/sp?marketplaceID=A2EUQ1WTGCTBG2&amp;seller=A1B17WSZGN1XUQ&amp;ref=dp_merchant_link</a>
102.	PlatinumG 【7-15 Fast Delivery】	<a href="https://www.amazon.com/sp?seller=AW3Q351NVRMH1">https://www.amazon.com/sp?seller=AW3Q351NVRMH1</a>
103.	Puhio	<a href="https://www.amazon.ca/sp?seller=A3QBVT1O3Q2ZX2">https://www.amazon.ca/sp?seller=A3QBVT1O3Q2ZX2</a>
104.	rianig07	<a href="https://www.amazon.com/sp?seller=A3W2UNBFL9LRA1">https://www.amazon.com/sp?seller=A3W2UNBFL9LRA1</a>
105.	THJKT-STORE	<a href="https://www.amazon.com/sp?seller=AATSE4C2UCPQO">https://www.amazon.com/sp?seller=AATSE4C2UCPQO</a>
106.	URbear	<a href="https://www.amazon.com/sp?seller=a3f3ruae5evhnb">https://www.amazon.com/sp?seller=a3f3ruae5evhnb</a>
107.	YangheDuoDuo	<a href="https://www.amazon.com/sp?seller=ANDBHNB60NAMH">https://www.amazon.com/sp?seller=ANDBHNB60NAMH</a>
108.	yanmeirensangmao	<a href="https://www.amazon.com/sp?seller=A1CJ6FT9WJEO3E">https://www.amazon.com/sp?seller=A1CJ6FT9WJEO3E</a>
109.	yingchenmaoyi	<a href="https://www.amazon.com/sp?seller=A39CER70ODHRVM">https://www.amazon.com/sp?seller=A39CER70ODHRVM</a>
110.	ziboshihengjitaizhidianzishangwu youxiangongs	<a href="https://www.amazon.com/sp?seller=A2RNXMNMUUZLCO">https://www.amazon.com/sp?seller=A2RNXMNMUUZLCO</a>
111.	ck1999ak	<a href="https://www.dhgate.com/store/about-us/21224987.html">https://www.dhgate.com/store/about-us/21224987.html</a>
112.	deng09	<a href="https://www.dhgate.com/store/about-us/21728810.html">https://www.dhgate.com/store/about-us/21728810.html</a>
113.	exchangeeyes	<a href="https://www.dhgate.com/store/about-us/21715111.html">https://www.dhgate.com/store/about-us/21715111.html</a>
114.	jacqueline_chou store	<a href="https://www.dhgate.com/store/14408354?dspm=pceen.pd.logostore.1.g7bXH68kdnSIKTrqfKCT&amp;resource_id=">https://www.dhgate.com/store/14408354?dspm=pceen.pd.logostore.1.g7bXH68kdnSIKTrqfKCT&amp;resource_id=</a>
115.	kuo07	<a href="https://www.dhgate.com/store/about-us/21729507.html">https://www.dhgate.com/store/about-us/21729507.html</a>
116.	kuo09	<a href="https://www.dhgate.com/store/about-us/21729509.html">https://www.dhgate.com/store/about-us/21729509.html</a>
117.	lang10	<a href="https://www.dhgate.com/store/about-us/21756569.html">https://www.dhgate.com/store/about-us/21756569.html</a>

No.	PI Defendants	PI Defendant Domain Names or Online Marketplace Accounts
118.	lian Cheng08	<a href="https://www.dhgate.com/store/about-us/21733992.html">https://www.dhgate.com/store/about-us/21733992.html</a>
119.	missyoungs	<a href="https://www.dhgate.com/store/about-us/21572698.html">https://www.dhgate.com/store/about-us/21572698.html</a>
120.	niao10	<a href="https://www.dhgate.com/store/about-us/21753454.html">https://www.dhgate.com/store/about-us/21753454.html</a>
121.	piao10	<a href="https://www.dhgate.com/store/about-us/21755150.html">https://www.dhgate.com/store/about-us/21755150.html</a>
122.	qiuti14	<a href="https://www.dhgate.com/store/about-us/21733547.html">https://www.dhgate.com/store/about-us/21733547.html</a>
123.	xing10	<a href="https://www.dhgate.com/store/about-us/21755266.html">https://www.dhgate.com/store/about-us/21755266.html</a>
124.	xue10	<a href="https://www.dhgate.com/store/about-us/21434827.html">https://www.dhgate.com/store/about-us/21434827.html</a>
125.	yanqin05	<a href="https://www.dhgate.com/store/about-us/21625946.html">https://www.dhgate.com/store/about-us/21625946.html</a>
126.	ahaamu0	<a href="https://www.ebay.com/usr/ahaamu0">https://www.ebay.com/usr/ahaamu0</a>
127.	anything_you_want_seller	<a href="https://www.ebay.com/usr/anything_you_want_seller">https://www.ebay.com/usr/anything_you_want_seller</a>
128.	dr7642	<a href="https://www.ebay.com/usr/dr7642">https://www.ebay.com/usr/dr7642</a>
129.	eyegotwhatuwant	<a href="https://www.ebay.com/usr/eyegotwhatuwant">https://www.ebay.com/usr/eyegotwhatuwant</a>
130.	godayalagechathguna_0	<a href="https://www.ebay.com/usr/godayalagechathguna_0">https://www.ebay.com/usr/godayalagechathguna_0</a>
131.	laxstore_99	<a href="https://www.ebay.com/usr/laxstore_99">https://www.ebay.com/usr/laxstore_99</a>
132.	madura819	<a href="https://www.ebay.com/usr/madura819">https://www.ebay.com/usr/madura819</a>
133.	one_two_shop17	<a href="https://www.ebay.com/usr/one_two_shop17">https://www.ebay.com/usr/one_two_shop17</a>
134.	pixo_shop	<a href="https://www.ebay.com/usr/pixo_shop">https://www.ebay.com/usr/pixo_shop</a>
135.	ranravi-76	<a href="https://www.ebay.com/usr/ranravi-76">https://www.ebay.com/usr/ranravi-76</a>
136.	sandasan_180rf13zr	<a href="https://www.ebay.com/usr/sandasan_180rf13zr">https://www.ebay.com/usr/sandasan_180rf13zr</a>
137.	uniqueoneshop	<a href="https://www.ebay.com/usr/uniqueoneshop">https://www.ebay.com/usr/uniqueoneshop</a>
138.	11755994 CANADA CORPORATION	<a href="https://www.wish.com/merchant/6130fa13f51e5522b7adb38e">https://www.wish.com/merchant/6130fa13f51e5522b7adb38e</a>
139.	fqlg	<a href="https://www.wish.com/merchant/5eda5abfa9a45429002a51c9">https://www.wish.com/merchant/5eda5abfa9a45429002a51c9</a>
140.	pomona	<a href="https://www.wish.com/merchant/564098a842ebd82429737518">https://www.wish.com/merchant/564098a842ebd82429737518</a>
141.	QWQQ	<a href="https://www.wish.com/merchant/5985d27e3eb22a39fd2f95e3">https://www.wish.com/merchant/5985d27e3eb22a39fd2f95e3</a>
142.	Red Pen	<a href="https://www.wish.com/merchant/5d46a83d56a2605fc01bd65d">https://www.wish.com/merchant/5d46a83d56a2605fc01bd65d</a>

No.	PI Defendants	PI Defendant Domain Names or Online Marketplace Accounts
144.	Wenhaojia Books	<a href="https://www.wish.com/merchant/5dcfd48aaf8da41915e9d417">https://www.wish.com/merchant/5dcfd48aaf8da41915e9d417</a>